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November 30, 2022

VIA ECF

The Honorable Lorna G. Schofield
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: *Manbro Energy Corp. v. Chatterjee Advisors, LLC, et al.*, No. 20-cv-3773 (LGS):
Request to File Under Seal

Dear Judge Schofield:

We respectfully write on behalf of Plaintiff Manbro Energy Corporation (“Plaintiff”), in accordance with Paragraph I.D.3 of Your Honor’s Individual Rules, to request leave to file under seal Exhibits A-J, L, O-P, R-T, W and X to the Declaration of Mark E. McDonald in Support of Plaintiff’s Motions *in Limine* (“McDonald Decl.”) (collectively, the “Exhibits”), as well as Plaintiff’s Motion *in Limine* No. 7 (the “Motion”). Parties and attorneys of record who should have access to the sealed documents are listed in Appendix A.

Plaintiff makes this sealing request pursuant to Paragraph 11 of the Stipulation and Order of Confidentiality, dated October 21, 2020 (ECF No. 51) (the “Confidentiality Order”). The Exhibits and Motion contain Confidential Information or Discovery Material, as defined in the Confidentiality Order, including excerpts of deposition testimony and materials produced by Defendants in this case. The Court earlier granted the parties’ joint request to seal three of the Exhibits, including McDonald Decl. Exhibits R, T, and W.¹ ECF No. 215 at 1 (Order); *see also* ECF No. 171 (Joint Letter Motion to Seal); ECF No. 216 (Weitzman Decl.).

¹ These documents were filed, respectively, as Exhibits 39 and 19 to the Declaration of Kal Blassberger in Support of Plaintiff’s Motion for Partial Summary Judgment and in Opposition to Defendants’ Motion for Summary Judgment (ECF No. 203), and Exhibit 31 to the Declaration of Avi Weitzman in Support of Defendants’ Motion for Summary Judgment and Opposition to Plaintiff’s Cross-Motion for Partial Summary Judgment (ECF No. 216) (“Weitzman Decl.”).

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Pursuant to Paragraph I.D.3 of Your Honor's Individual Rules, Plaintiff notes that it has no interest in confidential treatment of the information contained in the Exhibits and Motion and, therefore, absent objection by Defendants, would propose to file the Exhibits and Motion on the public docket without any redactions. Should Defendants object to public filing and/or propose redactions, Plaintiff will of course be guided by the Court.

Respectfully Submitted,

/s/ Mark E. McDonald

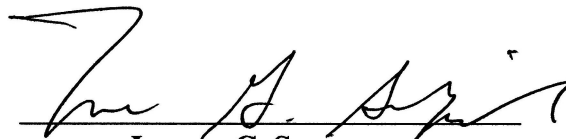
Mark E. McDonald

cc: All Counsel of Record (via ECF)

If Defendants seek to maintain under seal any of the documents addressed above, they shall file a letter motion stating the grounds for sealing by **January 5, 2023**, and otherwise the documents may be made public. Defendants' letter shall address, if applicable, why any documents should be filed entirely under seal rather than redacted.

So Ordered.

Dated: January 3, 2023
New York, New York



LORNA G. SCHOFIELD
UNITED STATES DISTRICT JUDGE

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Appendix A – Parties and Attorneys of Record

Parties

Manbro Energy Corporation

Chatterjee Advisors, LLC

Chatterjee Fund Management, LP

Chatterjee Management Company, d/b/a The Chatterjee Group

Purnendu Chatterjee

Cleary Gottlieb Steen & Hamilton LLP

Victor L. Hou

Mark E. McDonald

JD Colavecchio

Victoriya Levina

King & Spalding LLP

Randy M. Mastro

Mark A. Kirsch

Shaila Rahman Diwan

Casey Kyung-Se Lee